



Civ. 16-  
Notice of and Petition for Removal

5. Defendant State Farm Mutual Automobile Insurance Company received a copy of the Summons and Complaint on or about March 7, 2016.

7. Attached to and filed with this notice are copies of the Summons and the Complaint with Jury Trial Demand, which are the only process, pleadings, or orders served upon Defendant in this matter.

8. With respect to the amount in controversy, Plaintiffs' Complaint seeks compensatory damages, attorney's fees, punitive damages, and pre-judgment interest. The amount Plaintiffs seek to recover from Defendant exceeds Seventy Five Thousand Dollars (\$75,000), exclusive of interest and costs.

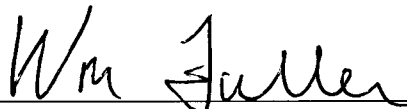
9. Defendant will give written notice of the filing of this notice to all adverse parties as required by 28 U.S.C. § 1446(d).

10. A copy of this notice will be filed with the Codington County Clerk of the South Dakota Circuit Court, Third Judicial Circuit, as required by 28 U.S.C. § 1446(d).

WHEREFORE, Defendant requests that this action proceed in this Court as an action properly removed to it.

Dated this 23rd day of March, 2016.

FULLER & WILLIAMSON, LLP

A handwritten signature in black ink, appearing to read "Wm Fuller", is written over a horizontal line.

William Fuller

Eric Preheim

7521 S. Louise Avenue

Sioux Falls, SD 57108

Phone 605-333-0003

Fax 605-333-0007

Email [bfuller@fullerandwilliamson.com](mailto:bfuller@fullerandwilliamson.com)

[epreheim@fullerandwilliamson.com](mailto:epreheim@fullerandwilliamson.com)

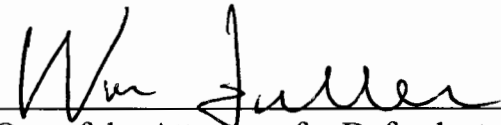
Attorneys for Defendant

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**Certificate of Service**

I certify that on the 23rd day of March, 2016, I sent via United States first-class mail, postage prepaid, a true and correct copy of the foregoing Notice of and Petition for Removal to:

Nancy J. Turbak Berry  
Turbak Law Office, P.C.  
26 South Broadway, Suite 100  
Watertown, SD 57201  
*Attorneys for Plaintiff*

  
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One of the Attorneys for Defendant